



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WK:VC
F. #2023R00955

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 28, 2024

By ECF

The Honorable Nina R. Morrison
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Joseph Grunwald
Criminal Docket No. 24-19 (NRM) (JAM)

Dear Judge Morrison:

The government respectfully submits this request to adjourn the status conference in the above-captioned matter which is currently scheduled for February 29, 2024 at 11:30 a.m. Due to personal reasons, I am out of the office through March 8, 2024, and the government believes it would be in the interest of judicial efficiency to adjourn the conference until after I have returned. There have been no previous requests for adjournment. I have spoken with counsel for the defendant, and she consents to the adjournment. Counsel for the government and the defendant are both available for a rescheduled conference on the afternoon of March 14 or any time on March 12, 13, 19, 20 or 22.

Should the Court grant the government's request for an adjournment, the government also respectfully requests that the Court enter an order of excludable delay, pursuant to Title 18, United States Code, Section 3161(h)(7)(A), until the date of the rescheduled status

conference in order to allow the parties to engage in plea negotiations to resolve this case short of trial. Counsel for the defendant has no objection to the entry of such an order.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/ Vincent Chiappini
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cc: Clerk of Court (NRM) (by ECF and e-mail)
Allegra W. Glashausser (by ECF and e-mail)